

**REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-35 are pending, of which claims 1, 13, 17, 21, 26, 29, and 33 have been amended.

5 Applicant's amendments and remarks after Final are appropriate under 37 C.F.R. §1.116 because they address the Office's remarks in the Final Action, and thus could not have been presented earlier. In addition, the amendments and remarks should be entered to place the case in better form for appeal.

10

**35 U.S.C. §103 Claim Rejections**

A. Claims 1-5, 7-12, 17-18, 21-24, and 29-31 are rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent No. 6,356,941 to Cohen (hereinafter, "Cohen"), in view of U.S. Patent No. 6,314,500 to Rose (hereinafter, "Rose") (*Office Action* p.2). Applicant respectfully traverses the rejection.

15

B. Claims 6, 19-20, 25, and 32 are rejected under 35 U.S.C. §103(a) for obviousness over Cohen in view of Rose, and further in view of U.S. Patent No. 6,351,813 to Mooney et al. (hereinafter, "Mooney") (*Office Action* p.10). Applicant respectfully traverses the rejection.

20

C. Claims 13-14 and 16 are rejected under 35 U.S.C. §103(a) for obviousness over Cohen in view of Rose, and further in view of U.S. Patent No. 6,067,618 to Weber (hereinafter, "Weber") (*Office Action* p.11). Applicant respectfully traverses the rejection.

D. Claim 15 is rejected under 35 U.S.C. §103(a) for obviousness over Cohen in view of Rose and Weber, and further in view of Mooney (*Office Action* p.14). Applicant respectfully traverses the rejection.

25

E. Claims 26-28 and 33-35 are rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent No. 5,546,557 to Allen et al. (hereinafter, "Allen"), in view of Rose (*Office Action* p.15). Applicant respectfully traverses the rejection.

5

Traversal A. Claims 1-5, 7-12, 17-18, 21-24, and 29-31 rejected over Cohen in view of Rose:

Applicant describes and claims a secure storage unit that is located as a remote unit coupled by a communications network to a client computer. The secure storage unit appears as a local logical storage device to the client computer which can be accessed via standard file access for a peripheral storage device. The client computer and a user of the computer are unaware that the secure storage unit is remote to the client computer (*Specification Summary* pp.3-4; see claim 1, for example).

Cohen describes a method for secure data storage through a protected central storage facility to which access is controlled through a network from a remote location (*Cohen* col.5, lines 40-45). Contrary to the remote storage system described in Cohen, Rose describes a shared memory system within a single computer (*Rose* col.5, lines 10-25). Applicant disagrees with the Cohen-Rose combination because there is no motivation to combine the shared memory system of a single computer in Rose with a computer and remote secure data storage system as described in Cohen. There is no indication whatsoever in Rose of a remote data storage connected via a network to a computer.

25

Claim 1 recites “initiating a request for accessing a dedicated data storage unit of the remote secure storage facility, the request being initiated by selecting a directory path displayed such that the remote secure storage facility appears as a local storage device of the client computer, the directory path specifying at least the remote secure storage facility and a user identification code”, and “identifying the dedicated data storage unit associated with the specified user identification code”.

Cohen and/or Rose do not teach or suggest a request being initiated by selecting a directory path displayed such that the remote secure storage facility appears as a local storage device of the client computer, the directory path specifying at least the remote secure storage facility and a user identification code, as recited in claim 1. Additionally, the Office recognizes that Cohen does not teach a data storage unit associated with a user identification code, a request specifying the remote secure storage facility and the user identification code, or identifying the dedicated data storage unit associated with the specified user identification code (*Office Action* p.3).

The Office cites Rose for teaching a data storage unit associated with a user identification code, and the other features of claim 1 that are not taught by Cohen (*Office Action* p.3). Applicant disagrees that Rose teaches a user identification code as recited within the context of claim 1. As described above, Rose is not analogous to the system of claim 1 that includes a secure storage unit located as a remote unit coupled by a communications network to a client computer.

Rose only describes a memory system within a single computer, and there is no need or reason for a user identification code associated with the memory system. The Office cites to source identification information associated with a “requester” in Rose as the user identification code recited in

claim 1 (*Office Action* p.3; *Rose* col.5, lines 1-9). However, a requester in *Rose* is not a user as recited within the context of claim 1. A requester in *Rose* is simply a processor, processing unit, or logic circuitry within a single computer (*Rose* col.4, lines 36-38). *Rose* does not show any such user identification  
5 code, or a user identification code that is specified in a directory path that specifies a remote secure storage facility, as recited in claim 1.

In *Response to Arguments*, the Office again states that “*Rose* teaches ‘the data storage unit associated with a user identification code’ (see Abstract; see column 5, lines 4-9, and column 8, lines 25-36.)” (*Office Action* p.19).  
10 Applicant respectfully disagrees – not one of the cited sections of *Rose* states any such “user identification code”, as the Office contends.

Claim 1 also recites “in response to the request, automatically connecting to the remote secure storage facility at the associated address”.  
15 Cohen and/or *Rose* also do not teach or suggest automatically connecting to the remote secure storage facility in response to a request being initiated by selecting a directory path displayed such that the remote secure storage facility appears as a local storage device of the client computer, as recited in claim 1.

The Office does not cite *Rose*, but cites Cohen for teaching that a user is  
20 provided access to a network vault if permitted to do so (*Office Action* p.3; *Cohen* col.4, lines 23-45). However, there is no indication in Cohen of automatically connecting to a remote secure storage facility in response to the request recited in claim 1. As described above, the remote secure storage facility appears as a local storage device of the client computer, and the client  
25 computer and a user of the computer are unaware that the secure storage facility is remote to the client computer.

Accordingly, claim 1 along with dependent claims 2-5 and 7-12 are allowable over the Cohen-Rose combination for at least the reasons described above and Applicant respectfully requests that the §103 rejection be withdrawn.

5

Claim 17 recites a secure storage facility comprising “receiving an access request from a user on a remotely located client computer, the access request being initiated as a directory path selection displayed such that the secure storage facility appears as a local storage device of the client computer,  
10 the directory path specifying at least a user identification code”, and “identifying a dedicated data storage unit associated with the specified user identification code”.

As described above in the response to the rejection of claim 1, Cohen and/or Rose do not teach or suggest an access request being initiated as a  
15 directory path selection displayed such that the secure storage facility appears as a local storage device of the client computer, the directory path specifying at least a user identification code, as recited in claim 17. Further, the Office recognizes that Cohen does not teach the features of claim 17, and there is no indication in either Cohen or Rose that a dedicated data storage unit is  
20 associated with a user identification code.

Accordingly, claim 17 along with dependent claim 18 is allowable over the Cohen-Rose combination and Applicant respectfully requests that the §103 rejection be withdrawn.

25 Claim 21 recites a secure data storage system comprising “a dedicated data storage unit configured to maintain data files generated by the remote computing device, the dedicated data storage unit identified by an identification

code corresponding to the remote computing device”, and “a processing component configured to receive and process a request to access the dedicated data storage unit, the request being initiated as a directory path selection displayed such that the dedicated data storage unit appears as a local storage  
5 device of the computing device, the directory path specifying the communications network address, the identification code, and a data file maintained with the dedicated data storage unit.”

As described above in the response to the rejection of claim 1, Cohen and/or Rose do not teach or suggest a request being initiated as a directory path  
10 selection displayed such that the dedicated data storage unit appears as a local storage device of the computing device, the directory path specifying communications network address, the identification code, and a data file maintained with the dedicated data storage unit, as recited in claim 21. Further, the Office recognizes that Cohen does not teach the features of claim 21, and  
15 there is no indication in either Cohen or Rose that a dedicated data storage unit is identified by an identification code corresponding to the remote computing device.

Accordingly, claim 21 along with dependent claims 22-24 are allowable over the Cohen-Rose combination and Applicant respectfully requests that the  
20 §103 rejection be withdrawn.

Claim 29 recites a method comprising “receiving a request to access the dedicated data storage unit, the request being initiated as a directory path selection displayed such that the dedicated data storage unit appears as a local  
25 storage device of the remote computing device, the directory path specifying the communications network address, the identification code, and a data file maintained with the dedicated data storage unit”.

As described above in the response to the rejection of claim 1, Cohen and/or Rose do not teach or suggest a request being initiated as a directory path selection displayed such that the dedicated data storage unit appears as a local storage device of the remote computing device, the directory path specifying  
 5 communications network address, the identification code, and a data file maintained with the dedicated data storage unit, as recited in claim 29.

Accordingly, claim 29 along with dependent claims 30-31 are allowable over the Cohen-Rose combination and Applicant respectfully requests that the §103 rejection be withdrawn.

10

**Traversal B.**      **Claims 6, 19-20, 25, and 32 rejected over Cohen in view of Rose and Mooney:**

Claim 6 is allowable by virtue of its dependency upon claim 1 which is allowable over the Cohen-Rose combination for at least the reasons described  
 15 above in response to the rejection of claim 1.

Claim 19 recites "a data file to be stored in the dedicated data storage unit associated with a user identification code is encrypted in accordance with a user assigned security level." Cohen and/or Rose do not teach or suggest that a  
 20 data file is encrypted in accordance with a user assigned security level, as recited in claim 19. The Office recognizes that Cohen does not teach an assigned security level and rejects claim 19 along with claim 6 (*Office Action* p.10). However claim 6 does not recite a user assigned security level, as recited in claim 19. The Office does not cite Rose, but cites Mooney for  
 25 teaching that a data file is encrypted in accordance with an assigned security level (*Office Action* p.10). There is no indication in Mooney, however, that a data file is encrypted in accordance with a user assigned security level.

Accordingly, the Office has not provided a *prima facie* rejection of claim 19, and claim 19 is allowable over the Cohen-Rose-Mooney combination and the §103 rejection should be withdrawn.

5        Claim 20 is allowable by virtue of its dependency upon claim 17 which is allowable over the Cohen-Rose combination for at least the reasons described above in response to the rejection of claim 17.

Claim 25 is allowable by virtue of its dependency upon claim 21 which is allowable over the Cohen-Rose combination for at least the reasons  
10       described above in the response to the rejection of claim 21.

Claim 32 is allowable by virtue of its dependency upon claim 29 which is allowable over the Cohen-Rose combination for at least the reasons described above in the response to the rejection of claim 29.

15        Traversal C.        Claims 13-14 and 16 rejected over Cohen in view of Rose and Weber:

Claim 13 recites "receiving a request from a user on the client computer to access the logical data storage peripheral, the request being initiated by selecting a directory path displayed such that the remote secure storage facility  
20       appears as a local storage device of the client computer, the directory path specifying at least the logical data storage peripheral and a user identification code".

      Cohen, Rose, and/or Weber do not teach or suggest a secure storage facility located remotely to a client computer, a request being initiated by  
25       selecting a directory path displayed such that the remote secure storage facility appears as a local storage device of the client computer, or the directory path



specifying at least the logical data storage peripheral and a user identification code, as recited in claim 13.

As described above in the response to the rejection of claim 1, the Office recognizes that Cohen does not teach the features of claim 13, and there is no indication in either Cohen or Rose that a dedicated data storage unit is associated with a user identification code. Weber is not cited by the Office, and does not show, a dedicated data storage unit that is associated with a user identification code, as recited in claim 13.

Further, as described above in the response to the rejection of claim 1, Rose describes a memory system within a single computer system and there is no motivation to combine Rose with Cohen. There is no need or reason to identify the memory system in Rose with an identification code corresponding to the computer system that includes the memory system.

Similar to Rose, Weber describes a single computer that includes two or more hard disk drives (*Weber* col.5, lines 14-15). Applicant also disagrees with the Cohen-Weber combination because there is no motivation to combine the memory system of a single computer in Weber with a computer and remote secure data storage system as described in Cohen. There is no indication in Weber of a remote data storage connected via a network to a computer. Further, Applicant disagrees that Weber teaches a user identification code as recited within the context of claim 1 because Weber describes a memory system within a single computer, and there is no need or reason for a user identification code associated with the memory system in Weber.

Accordingly, claim 13 along with dependent claims 14 and 16 are allowable over the Cohen-Rose-Weber combination for at least the reasons described above and Applicant respectfully requests that the §103 rejection be withdrawn.

**Traversal D.**      **Claim 15 rejected over Cohen in view of Rose, Weber, and Mooney:**

Claim 15 is dependent upon claim 13 (via claim 14) and recites that a  
 5 data file "is encrypted in accordance with a user assigned security level." The  
 Office does not cite Rose or Weber to reject claim 15, and the Office  
 recognizes that Cohen does not teach encrypting a data file in accordance with  
 a user assigned security level (*Office Action* p.14). As described above in the  
 response to the rejection of claim 19, there is no indication in Mooney that a  
 10 data file is encrypted in accordance with a user assigned security level.

Accordingly, the Office has not provided a *prima facie* rejection of  
 claim 15, and claim 15 is allowable over the Cohen-Rose-Weber-Mooney  
 combination. Applicant respectfully requests that the §103 rejection be  
 withdrawn.

15

**Traversal E.**      **Claims 26-28 and 33-35 rejected over Allen in view of Rose:**

Claim 26 recites a computing device comprising "a controller  
 configured to receive a request to access the logical data storage peripheral, the  
 20 request being initiated as a directory path selection displayed such that the  
 logical data storage peripheral corresponding to the remote secure data storage  
 system appears as a local storage device of the computing device, the directory  
 path specifying the logical data storage peripheral, the identification code, and  
 a data file maintained with the dedicated data storage unit".

25 Allen and/or Rose do not teach or suggest a request being initiated as a  
 directory path selection displayed such that the logical data storage peripheral  
 corresponding to the remote secure data storage system appears as a local

storage device of the computing device, the directory path specifying the logical data storage peripheral, the identification code, and a data file maintained with the dedicated data storage unit, as recited in claim 26. Further, the Office recognizes that Allen does not teach a dedicated data storage unit  
5 identified by an identification code corresponding to a computing device, as recited in claim 26 (*Office Action* p.16).

As described above in the response to the rejection of claim 1, Rose also does not teach a remote dedicated storage unit identified by an identification code corresponding to a computing device because Rose describes a memory  
10 system within a single computer system and there is no reason to identify the memory system with an identification code corresponding to the computer system that already includes the memory system.

Accordingly, claim 26 along with dependent claims 27-28 are allowable over the Allen-Rose combination for at least the reasons described above and  
15 Applicant respectfully requests that the §103 rejection be withdrawn.

Claim 33 recites "receiving the request to access the logical data storage peripheral, the request being initiated as a directory path selection displayed such that the logical data storage peripheral appears as a local storage device of  
20 the computing device, the directory path specifying the logical data storage peripheral, the identification code, and a data file maintained with the dedicated data storage unit".

Allen and/or Rose do not teach or suggest a computing device and a remote secure data storage system, or a request being initiated as a directory  
25 path selection displayed such that the logical data storage peripheral appears as a local storage device of the computing device, the directory path specifying

the logical data storage peripheral, the identification code, and a data file maintained with the dedicated data storage unit, as recited in claim 33.

Further, the Office recognizes that Allen does not teach a dedicated data storage unit identifiable by an identification code that corresponds to a computing device, as recited in claim 33 (*Office Action* pp.16-17). As described above in the response to the rejection of claim 1, Rose also does not teach a remote dedicated storage unit identified by an identification code corresponding to a computing device because Rose describes a memory system within a single computer system and there is no reason to identify the memory system with an identification code corresponding to the computer system that already includes the memory system.

Accordingly, claim 33 along with dependent claims 34-35 are allowable over the Allen-Rose combination and Applicant respectfully requests that the §103 rejection be withdrawn.

#### Conclusion

Pending claims 1-35 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. If any issues remain that preclude issuance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: Jan 17, 2005

By: 

David A. Morasch  
Reg. No. 42,905  
(509) 324-9256 x 210